

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2019-365-E

In re:)	
Explorations of a South Carolina)	
Competitive Procurement Program)	
As allowed by S.C. Code)	
Section 58-41-20(E)(2))	
)	
)	PETITION TO INTERVENE
		OF JOHNSON DEVELOPMENT
		ASSOCIATES, INC.

Petition to Intervene of Johnson Development Associates, Inc.

Johnson Development Associates, Inc. (“JDA”), in accordance with SC Code Regs. 103-825, submits this petition to intervene in the subject docketed proceeding. In support of this petition, JDA provides the following:

1. On November 26, 2019, the Public Service Commission of South Carolina (“Commission”) opened Docket 2019-365-E in accordance with South Carolina’s Energy Freedom Act (“The Act”) to explore a South Carolina Competitive Procurement Program allowable under S.C. Code Ann. § 58-41-20(E)(2).
2. The Commission has not yet established a procedural schedule for this application. As such, JDA’s petition is timely filed.
3. JDA is a South Carolina Corporation, founded in 1986 and headquartered at 100 Dunbar Street, Spartanburg, South Carolina, 29306. JDA is a multi-division developer of industrial, multi-family, self-storage, renewable energy, and commercial projects.
4. JDA has a direct and substantial interest in the outcome of this proceeding, and will be directly affected by the discussion and resolution of the topics covered therein. JDA’s

position and market presence relates directly to the details of this docket. JDA has or will have qualifying facilities under development that will be impacted by the decisions this Commission makes regarding the exploration of a competitive procurement process in South Carolina.

5. JDA's interest in this proceeding cannot be adequately represented or protected by any other party.
6. Petitioner has previously received approval for intervention from this Commission.
7. Pursuant to SC Code Regs. 103-804(T), JDA is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 19th day of December, 2019.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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